

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PEARSON EDUCATION, INC.; ELSEVIER,  
INC.; MCGRAW-HILL GLOBAL EDUCATION  
HOLDINGS, LLC; and CENGAGE LEARNING,  
INC.,

Plaintiffs,

v.

IMRAN AWAN; AMRO T. AWWAD; RONG LI;  
ANITA RAIN RANI; VIJAY KUMAR; AMMAR  
ABDULWAHID MAZRUI; MICHAEL PAO  
(A/K/A MATTHEW WATSON); NIDIA  
ESPINOZA; MANISH KUMAR SINGH (A/K/A  
“MAX DEN” and “SHYAM”); ROSCHELLE T.  
SALMON; and YAROSLAV IAKOVIN,

Defendants.

**Case No. 1:18-cv-402-DLC**

**MOTION FOR DEFAULT JUDGMENT  
AND PERMANENT INJUNCTION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration in Support, and the entire record herein, Plaintiffs McGraw-Hill Global Education Holdings, LLC, Pearson Education, Inc., Elsevier, Inc., and Cengage Learning, Inc. (collectively, “Plaintiffs”) hereby move for default judgment and a permanent injunction against Defendants Imran Awan, Amro T. Awwad, Rong Li, Vijay Kumar, Anita Rain Rani, Ammar Abdulwahid Mazrui, Michael Pao (a/k/a Matthew Watson), Nidia Espinoza, Manish Kumar Singh (a/k/a “Max Den” and “Shyam”), and Yaroslav Iakovin pursuant to Federal Rule of Civil Procedure 55(b)(2).

A Proposed Order is attached as Exhibit A.

Dated: September 28, 2018

Respectfully submitted,

*/s/ Kerry M. Mustico*

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